

**CALIFORNIA EMERGENCY MANAGEMENT AGENCY****PUBLIC SAFETY AND VICTIM SERVICES DIVISION**

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March 2, 2010

Cori Manthorne, Director of Programs  
Community Overcoming Relationship Abuse  
PO Box 5090  
San Mateo, CA 94402

Re: DV09201415,

Dear Ms. Manthorne:

On February 24, 2010, I conducted a site visit of the Domestic Violence Assistance Program operated by Community Overcoming Relationship Abuse. Thank you for your time and cooperation during the Site Visit. It was a pleasure meeting with you, Joy, Harvey, and the other staff working on the program.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified areas which need corrective action. Each finding is listed below, as well as the corrective action necessary for compliance and due date by which the corrective action must be completed.

**California Environmental Quality Act (CEQA)**

**Finding:** A current CEQA was not on file.

**Citation:** Recipient Handbook Section 2153 requires all Cal EMA funded projects to certify compliance with CEQA. A copy of the CEQA compliance memo or other certification must be completed once during the project's grant award cycle. The original copy must be retained on file for review during site and monitoring visits by Cal EMA staff.

**Corrective Action:** The project must obtain a current CEQA and submit a copy to OES by **May 5, 2010**. A sample CEQA Compliance memo is located in the Recipient Handbook, Appendix U.

**Comment:** Contact your city or county planning department to have them prepare an environmental document stating whether the project will have a significant effect on the environment.

**Fidelity Bond**

**Finding:** The project did not have the required Fidelity Bond documentation on file.

**Citation:** Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the total grant award, less matching funds. The certificate holder or first loss payee must be the "State of

California, Office of Emergency Services.” Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

Corrective Action: See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **May 5, 2010**.

### **Staff Personnel Files**

Finding: Neither the staff personnel files nor the volunteer files contained a signed and dated Drug Free Workplace statement.

Citation: Recipient Handbook Section 2152.3 (c)(2) states “(Employees) will agree to abide by the terms of the company’s [Drug Free Workplace] statement as a condition of employment on the contract or grant.”

Corrective Action: Personnel files for grant-funded staff must be brought into compliance by **May 5, 2010** and Cal EMA is to be notified once this is completed.

### **Organization Policies and Procedures**

Finding: The project lacks written organizational policy and procedures that establish the process whereby data is collected and then reported. The project has procedures for accomplishing the recording tasks, but lacks a formalized policy for the handling of data.

Citation: Recipient Handbook Section 11400 states, “The organization must have written policies and procedures covering hiring, firing, termination, conflict of interest, benefits, salary rates, travel, etc. There should also be written procedures regarding the accounting and reporting functions, including but not limited to a) Cash receipts and revenue; b) deposits; c) cash disbursements; d) payroll; e) general ledger; and f) equipment. In addition, any other policies and procedures (e.g., purchasing contracts) that relate to operating the project must be in writing.”

Corrective Action: Given the procedures are already in place, a comprehensive administrative policy and procedure manual should be created to formally document the methods used for the collection of data related to the project, the responsibility of personnel involved in the reporting of data, the policies for the operation of the business center on holidays and during lunch breaks, as well as all other procedural guidelines for the functioning of the business. While some of these components may already exist in individual forms, the accumulation of these policies into a standardized central form is needed. This process should be completed no later than **June 30, 2010**.

### **EEO Policy**

Finding #1: The project lacks written policies for language assistance services that provide Limited English Proficiency (LEP) persons with meaningful access, i.e. oral interpretation services, bilingual staff, telephone interpreter lines, written language services, community volunteers, etc.

Citation: Recipient Handbook Section 2151.7 states, “Cal EMA program staff will provide an EEO Checklist to recipients prior to all site/monitoring visits. The checklist will assist Cal EMA in verifying that recipients are in compliance with state and federal civil rights requirements by noting that various EEO documents (EEO Policy, Nondiscrimination Poster) are available at the site/monitoring.”

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should establish a written policy for addressing the needs of those with LEP.

Finding #2: The project does not distribute the written EEO policy to volunteers, clients, or the general public.

Citation: See Recipient Handbook Section 2151.7.

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should post a copy of all EEO Policies in a public forum in addition to distributing the EEO policy to volunteers during orientation.

Enclosed is a copy of the completed Site Visit Checklist form for your review. Please sign the cover page and return a copy of the page to me by **March 31, 2010** as confirmation of receipt.

Thank you again for your hospitality during the visit. If you have any questions or need assistance, please contact me at (916) 324-9104 or Jason.Stalder@calema.ca.gov

Sincerely,

Jason Stalder  
Criminal Justice Specialist  
Domestic Violence Section

Enclosures